

1 Kresta Nora Daly, SBN 199689
2 BARTH DALY LLP
3 PO Box F
4 Winters, CA 95696
5 Office: (916) 524-6762
6 Email: kdaly@barth-daly.com
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8 Attorneys for Defendant
9 CHI MO
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11 IN THE UNITED STATES DISTRICT COURT
12 FOR THE EASTERN DISTRICT OF CALIFORNIA
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14 UNITED STATES OF AMERICA,
15 Plaintiff,
16 v.
17 CHI MO,
18 Defendant.

Case No. 2:22-CR-00213-DC
STIPULATION AND PROPOSED
ORDER

19 The parties hereby stipulate as follows:
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- 21 1. In response to a stipulation, on July 3, 2025 Magistrate Judge Carolyn K.
22 Delaney ordered certain modifications of Mr. Mo's pre-trial release
23 conditions. ECF 476. Judge Delaney ordered a subsequent stipulation and
24 proposed order filed when Mr. Mo's travel plans were finalized.
- 25 2. Mr. Mo plans to travel to China from November 1 through November 14,
26 2025.
- 27 3. Since the filing of the first request to modify release conditions, Mr. Mo
28 learned that travel through China is easier if he is allowed to travel with his
new and old passport on him. His old passport contains prior visas to travel
to China. Mr. Mo was informed by family members that Chinese customs

are less likely to delay/detain him at the border if he can prove he has previously granted admission to China. Mr. Mo therefore requests to keep his old passport until he returns from China.

Dated: September 16, 2025

By s/ Veronica Alegria

Veronica Alegria

Assistant United States Attorney

Dated: September 16, 2025

By s/ Kresta Daly

KRESTA NORA DALY

BETTY WILLIAMS

Attorney for Chi Mo

1 Good Cause Appearing:

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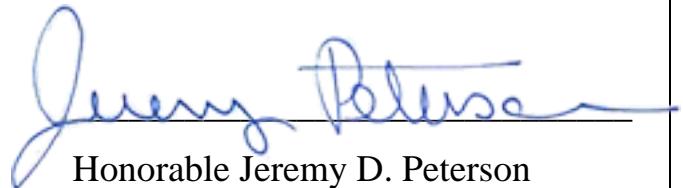
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- 1. Mr. Mo's release conditions are modified to allow Mr. Mo to travel to China in from November 1 through 14, 2025.
- 2. Mr. Mo may retain his old passport for the purposes of traveling to China.
- 3. Once Mr. Mo returns from China, within two business days, he will mail his new and old passports to the defense counsel to be surrendered to the Clerk's Office.

September 16, 2025



Honorable Jeremy D. Peterson

United States District Court Magistrate